

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 1:24-cv-23947 (Becerra/Torres)**

GOVERNMENT EMPLOYEES INSURANCE CO., et al.,

Plaintiffs,

v.

ANGELS DIAGNOSTIC GROUP, INC., et al.,

Defendants.

/

**DEFENDANTS' MOTION FOR HEARING**

COME NOW the Defendants, **ANGELS DIAGNOSTIC GROUP, INC., ALEJANDRO SANTOS, and RAUL ANDRES PEREZ-FALERO, M.D.** (“Defendants”), by and through undersigned counsel, and file this motion requesting a hearing before the United States Magistrate Judge Edwin G. Torres on April 3, 2025, at 2:30pm. The following are the matters that are at issue:

1. Discovery issues and disputes:

- An extension of time of more than two weeks is needed to properly respond to plaintiffs’ first requests for production of documents and first sets of interrogatories served on January 14, 2025, on the Defendants.
- Rule 26(a) required disclosures.
- A discovery stay or protective order may be needed to resolve these matters.

2. On January 14, 2025, Plaintiff’s served on Defendants, their first request for production and their first set of interrogatories.

3. On February 11, 2025, the Defendants filed an Unopposed Motion for Extension of Time to respond to Plaintiff's discovery requests. This Court granted the motion, allowing the Defendants until March 11, 2025, to file their response.

4. On March 12, 2025, the undersigned spoke with Plaintiffs' counsel and advised Mr. Max Gershenoff that the responses to the requests for discovery may tend to incriminate the Defendants'. However, the Plaintiffs' counsel was only willing to give a two-week extension. The undersigned submits that a two-week extension is not enough time to resolve this issue.

5. The undersigned counsel believes that a hearing to address these concerns would be beneficial to the progress of this proceeding.

**WHEREFORE**, the Defendants move for an order granting this relief and all appropriate orders.

**CERTIFICATE OF CONFERRAL**

Counsel for the Defendants certifies that he has conferred with plaintiffs' counsel on the relief sought, and plaintiffs' counsel opposes said relief.

Dated: March 21, 2025.

Respectfully submitted,

**GEORGE J. VILA, Esq.**  
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/s/ George J. Vila  
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(*Attorney for Defendants Angels Diagnostic Group, Inc., Alejandro Santos, and Raul Andres Perez-Falero, M.D.*)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 21<sup>st</sup> day of March 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ George J. Vila  
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**SERVICE LIST**

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